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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA**

In Re:

PHUONG NGUYEN AND
NICK WOLF

Debtors

FIA CARD SERVICES, N.A. (F.K.A.MBNA
AMERICA BANK, N.A.) AND
WELLS FARGO BANK, N.A.
Plaintiffs,

vs.

Phuong Nguyen,

Defendant

) Case No. 11-42478 RE

) Chapter 7

) **COMPLAINT TO DETERMINE
DISCHARGEABILITY OF DEBT U.S.C.
§523(a)(2)(A)**

Phuong Nguyen (hereinafter “Debtor” and “Defendant”), by and through her attorney of record, Nancy Weng, formally responds to FIA CARD SERVICES, N.A. (F.K.A. MBNA AMERICA BANK, N.A.) AND WELLS FARGO BANK, N.A. (hereinafter “Plaintiff”) Complaint to Determine Dischargeability of Debt under U.S.C. §523 (hereinafter “Complaint”):

I. PARTIES AND JURISDICTION

1. Defendant admits the allegations contained in numbered paragraph 1 of the Complaint.
2. Defendant admits the allegations contained in numbered paragraph 2 of the Complaint.
3. Defendant admits the allegations contained in numbered paragraph 3 of the Complaint.
4. Defendant admits the allegations contained in numbered paragraph 4 of the Complaint.

5. Defendant admits the allegations contained in numbered paragraph 5 of the Complaint.
6. Defendant admits the allegations contained in numbered paragraph 6 of the Complaint.
7. Defendant admits the allegations contained in numbered paragraph 7 of the Complaint.
8. Defendant denies the allegations contained in numbered paragraph 8 of the Complaint.
9. Defendant denies the allegations contained in numbered paragraph 9 of the Complaint.
10. Defendant denies the allegations contained in numbered paragraph 10 of the Complaint.
11. Defendant denies the allegations contained in numbered paragraph 11 of the Complaint.
12. Defendant denies the allegations contained in numbered paragraph 12 of the Complaint.
13. Defendant denies the allegations contained in numbered paragraph 13 of the Complaint.
14. Defendant denies the allegations contained in numbered paragraph 14 of the Complaint.
15. Defendant denies the allegations contained in numbered paragraph 15 of the Complaint.
16. Defendant denies the allegations contained in numbered paragraph 16 of the Complaint.
17. Defendant denies the allegations contained in numbered paragraph 17 of the Complaint.
18. Defendant admits the allegations contained in numbered paragraph 18 of the Complaint.
19. Defendant admits the allegations contained in numbered paragraph 19 of the Complaint.
20. Defendant denies the allegations contained in numbered paragraph 20 of the Complaint.
21. Defendant denies the allegations contained in numbered paragraph 21 of the Complaint.
22. Defendant denies the allegations contained in numbered paragraph 22 of the Complaint.
23. Defendant denies the allegations contained in numbered paragraph 23 of the Complaint.
24. Defendant denies the allegations contained in numbered paragraph 24 of the Complaint.
25. Defendant denies the allegations contained in numbered paragraph 25 of the Complaint.
26. Defendant denies the allegations contained in numbered paragraph 26 of the Complaint.
27. Defendant denies the allegations contained in numbered paragraph 27 of the Complaint.
28. Defendant denies the allegations contained in numbered paragraph 28 of the Complaint.
29. Defendant denies the allegations contained in numbered paragraph 29 of the Complaint.
30. Defendant denies the allegations contained in numbered paragraph 30 of the Complaint.

WHEREFORE, Debtor prays this Honorable Court to enter an order denying Plaintiff's

1 Prayer for Relief for:

- 2 1. All relief requested in Paragraph 1;
3 2. All relief requested in Paragraph 2;
4 3. All relief requested in Paragraph 3;
5 4. All relief requested in Paragraph 4;

6 Dated this 4th day of April, 2011
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9 /s/ Nancy Weng
10 NANCY WENG

11 Attorney for Debtor
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